

ATTORNEYS FOR DEFENDANTS
 TRIANGLE CROSS RANCH, LLC
 GERALD E. SCHNEIDER; MICHAEELEN P. SCHNEIDER
 MATHEW SCHNEIDER; MARK SCHNEIDER and THOMAS GEORGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

**CARLIE SHERMAN, ANNA GOZUN,
AMANDA NASH, and JOHN DOE** on behalf of
themselves and all similarly situated persons,

PLAINTIFFS,

V.

TRINITY TEEN SOLUTIONS, INC., a Wyoming corporation; **TRIANGLE CROSS RANCH, LLC**, a Wyoming limited liability corporation; **MONKS OF THE MOST BLESSED VIRGIN MARY OF MOUNT CARMEL, d/b/a MYSTIC MONK COFFEE**, a Wyoming corporation; **GERALD E. SCHNEIDER; MICHAEELEN P. SCHNEIDER; ANGELA C. WOODWARD; JERRY D. WOODWARD; DANIEL SCHNEIDER; MATHEW SCHNEIDER; MARK SCHNEIDER; KARA WOODWARD; KYLE WOODWARD; THOMAS GEORGE; JUDITH D. JEFFERIS; DALLY-UP, LLC**, a Wyoming limited liability corporation; **ROCK CREEK RANCH, INC.**, a Delaware corporation; **DIOCESE OF CHEYENNE**, a Wyoming corporation; and the **SOCIETY OF OUR LADY OF THE MOST HOLY TRINITY**, a Texas corporation; and **NEW MOUNT CARMEL FOUNDATION, INC.**, a Wyoming corporation,

DEFENDANTS.

Civil Case No. 20-CV-00215-SWS

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants Triangle Cross Ranch, LLC, Gerald E. Schneider, Michaelleen P. Schneider, Mathew Schneider, Mark Schneider, and Thomas George (TCR, the Schneiders, and George), through undersigned counsel, and pursuant to Local Rule 6.1(d) and (e) respectfully submit this Unopposed Motion for Extension of Time to Respond to the Complaint, up through and including January 22, 2021, and states as follows:

1. Undersigned counsel conferred with the plaintiffs' counsel regarding the requested relief. Plaintiffs do not oppose the extension.
2. This is the first extension requested by defendants TCR, the Schneiders, and George.
3. Undersigned counsel was recently retained and needs additional time to investigate the complex case [Doc. 4], including the claims involving the federal Trafficking Victims Protection Act (TVPA), the Racketeer Influenced and Corrupt Organizations Act (RICO) claims, and state negligence claims, as well as the 150-allegations in the Complaint [Doc. 1].
4. These defendants also anticipate needing additional time to confer with plaintiffs regarding the plaintiffs' intent with respect to amending the Complaint.
5. No party will be prejudiced by the extension.
6. For these reasons, defendants TCR, the Schneiders, and George request an extension of time up to and including January 22, 2021 to respond to the Complaint [Doc. 1].

WHEREFORE, defendants TCR, the Schneiders, and George respectfully ask the Court to grant an extension of time, through January 22, 2021, to respond to the Complaint. A proposed order is attached hereto.

Respectfully submitted this 28th day of December, 2020

WHITE & STEELE, P.C.

/s/ Rachel E. Ryckman

Rachel E. Ryckman, #7-4656

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THOMAS GEORGE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of December, 2020, a true and correct copy of the foregoing document was e-filed via CM/ECF and served to all attorneys of record:

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